

Message

From: Jeffrey H Birk [jeffrey.birk@basf.com]
Sent: 10/20/2020 8:35:17 PM
To: Crawford, Lydia [Crawford.Lydia@epa.gov]
CC: Schmid, Emily [Schmid.Emily@epa.gov]; Hathaway, Margaret [Hathaway.Margaret@epa.gov]; Kenny, Daniel [Kenny.Dan@epa.gov]; Meadows, Sarah [Meadows.Sarah@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]; Robert Yee [robert.yee@basf.com]
Subject: RE: [EXT] Engenia label comments
Attachments: Engenia NVA 2020-04-385-0133_8848CR8 (EPA changes 10-19-20).pdf; 007969-00UTE.20201020.NVA 2020-04-385-0133.pdf

Hello Lydia,

BASF is providing a clean revised proposed Engenia herbicide label (7969-UTE) and an annotated version with the changes that were made for your review.

Specific rebuttals to the requested changes are as follows:

1. Page 1, BASF does not include a number on page one of any of our product labels and Engenia should be consistent with that accepted practice.
2. The Summary of Label Requirements is provided on page 7 with references to sections of the label for more details. To try and summarize all of the use requirements would be to a large extent a duplication of the label itself.
3. ESA use restrictions on page 7, these restrictions should not be listed in the label, because they could change over time and there is a need to drive the user to the Bulletins Live website to check for the most current restrictions and to be able to document that they have checked for those restrictions relative to where they intend to apply Engenia.
4. Page 11, Resistance Management, the essential element of the proposed new language is fully contained within the existing language, and the new language lacks some of the additional information that helps to strengthen the current language as proposed.
5. Page 14, Roads, paved or gravel surfaces, mowed and/or managed areas adjacent to field, such as roadside rights-of-way. This inclusion of adjacent roadside rights-of-way was added in 2018 after a request for clarification by states and should remain part of the site description.
6. Page 15, Tank Mix Requirements section, the existing Tank Mixing Information section contains the requirements.
7. Pages 19 and 20, USE WITH OTHER HERBICIDES. The provided short list of other recommended tank mix herbicide options is consistent with the approved tank mix listing for Engenia herbicide and as such have already been vetted by BASF as to meeting all requirements to be tank mixed with Engenia.

Please let me know if you have questions or require additional changes.

JEFFREY BIRK

Product Registration Manager

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BASF Corporation

From: Crawford, Lydia <Crawford.Lydia@epa.gov>

Sent: Friday, October 16, 2020 4:49 PM

To: Jeffrey H Birk <jeffrey.birk@basf.com>

Cc: Schmid, Emily <Schmid.Emily@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Subject: [EXT] Engenia label comments

Good evening Jeff,

Please see the attached label comments for 7969-UTE. Make requested changes and send back clean and highlighted copies of the label as quickly as you can. If you have any rebuttals, please include them in the body of the email response. Hope you have a pleasant weekend.

Thanks,

Lydia Crawford PhD

Biologist | Herbicide Branch | Registration Division

U.S. Environmental Protection Agency | Office of Pesticide Programs

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